

## **APPENDIX D**

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### **Historic Records for Hazardous Waste Storage Area**

## HWSA HISTORIC RECORDS INDEX

Document Title	Date	Prepared By:
RCRA Facility Assessment Final Report	3/19/1990	PRC Environmental Management, Inc.
Plot Plan Zone 1 Rev 3	6/24/1987	Monsanto
Plot Plan Zone 1 Rev 1	9/12/1984	Monsanto

*Just Discharge  
Wecker  
extra*

**RCRA CONFIDENTIAL  
BUSINESS INFORMATION**  
DOES NOT CONTAIN NATIONAL  
SECURITY INFORMATION (E012065)

**RHONE-POULENC, INC.  
MARGINAL WAY FACILITY  
SEATTLE, WASHINGTON**

**RCRA FACILITY ASSESSMENT**

**FINAL REPORT**

**Prepared For**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, D.C. 20460**

Work Assignment No.	:	R10005
EPA Region	:	10
Site No.	:	WAD009282302
Date Prepared	:	March 19, 1990
Contract No.	:	68-W9-0009
PRC No.	:	012R1000503
Prepared by	:	PRC Environmental Management, Inc. Gary A. Bruno
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EPA Primary Contact	:	Chae Pak
Telephone No.	:	206/442-5153

**RECEIVED**  
MAR 24 1990

section (Figure 8). The waste storage area is constructed of a reinforced concrete floor with 63-inch-high concrete walls on three sides. The front of the waste storage area has open access. The floor and entranceway to the waste storage area slope towards drainage collection grates that channel water to a 1300-gallon-capacity sump. Any potential leachate from the open-ended storage tank, drum storage section, or product storage section as well as run-on rain water would drain to the sump and be recycled to the process system. The walled part of the waste storage area is roofed. A 6-inch concrete berm extends about 18 feet from each side wall towards the southern open end of the waste storage area (Photo 2) (Monsanto, 1986e; WDOE, 1985d; and RPI, 1989e).

### Status

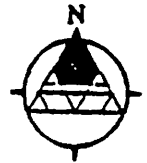
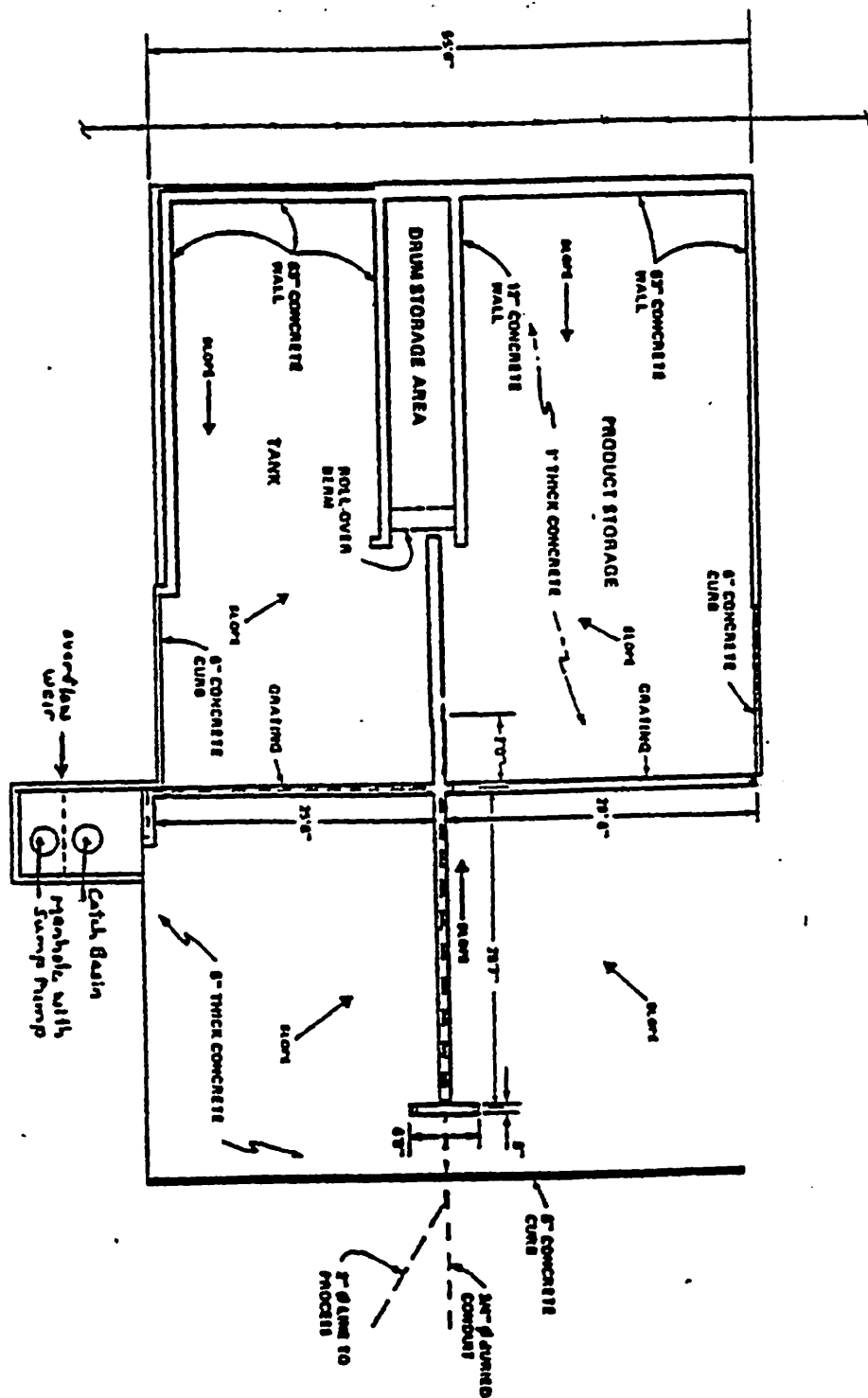
The RCRA hazardous waste storage area is active in that a small amount of VSB (a nonhazardous byproduct) are currently being stored on pallets on the east side of the area (Photo 3, 4). RPI notified WDOE on October 10, 1986, of its intent to change the status of this hazardous waste storage area from a RCRA interim status waste storage area to a less-than-90-day hazardous waste accumulation area. The hazardous waste storage area is currently being prepared for closure. RPI apparently has stored wastes at this area for periods of less than 90 days since acquiring plant ownership on October 1, 1986 (WDOE, 1985d; EPA, 1988b; and RPI, 1989e).

### Waste Type

Methylene chloride is the only RCRA-designated hazardous waste (F002) stored in this area. Other designated wastes are classified as either dangerous or extremely dangerous wastes under Washington State Dangerous Waste definitions. These include copper-contaminated strainer solids (WT01), waste degreasing solvents (e.g. Kingsolv) (WT01), and used Penetec oil residue (WT02) (Monsanto, 1986e; WDOE, 1989d; and RPI, 1989e). VSB, a nonhazardous byproduct of the vanillin purification process, have been stored in the product section of this storage area (EPA, 1988b; and RPI, 1989e).

### Waste Management

The RCRA hazardous waste storage area consists of separate storage sections--an open-ended tank storage section for strainer solids, a section for drummed wastes, and a section for VSB and various other products. The waste storage area has a reinforced concrete floor and walls. The floor and entryway slope towards drainage collection grates that



SCALE IN FEET

From: RPI, 1989e (Original Figure 2)

Figure 8. RCRA Hazardous Waste Storage Area

channel water to a 1300-gallon-capacity sump. Drainage water can be recycled to the plant's vanillin process system. All waste materials stored here have been assessed for incompatibility to ensure safe storage practices. The storage area has been roofed since about August, 1986. Side entrances to the facility are bermed. All materials brought to this storage site are logged into a notebook located near the facility entrance (Monsanto, 1986e; EPA, 1988b; and RPI, 1989e). Pending closure of this waste storage area, no strainer solids or drummed wastes are being stored here. Strainer solids are being kept temporarily in dumpsters near collection points throughout the plant. Drummed wastes of methylene chloride and solvents are being stored at SWMU Nos. 5 and 7, respectively.

### Environmental Releases

There are no recorded releases of any hazardous wastes from this waste storage area. However, before the roof was installed in 1986, the dry unconsolidated materials were exposed to wind and rain. A concern for site contamination was noted in a WDOE inspection report (WDOE, 1986e).

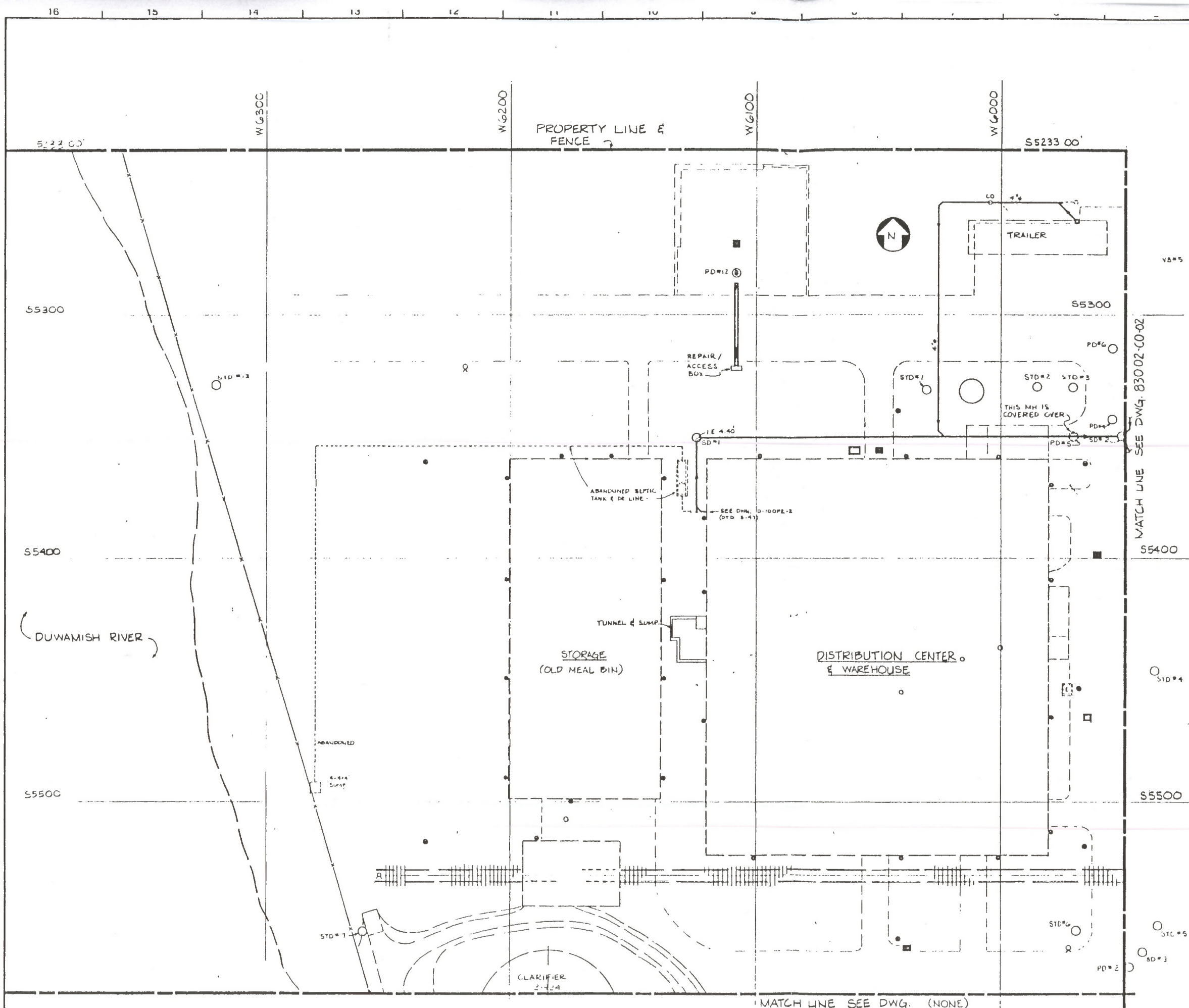
### Human and Environmental Targets

Environmental contamination could potentially occur to the air and soil from this hazardous waste storage area in extreme weather conditions. The dry, unconsolidated, copper-contaminated strainer solids are susceptible to wind dispersion. However, the waste storage area is now roofed. If the drainage sump becomes blocked, a situation that was noted during a WDOE inspection (WDOE, 1986e), leachate and run-on water could overflow from the area and contaminate surrounding soils. Although it is unlikely, a large overflow could drain westward into the Duwamish River Waterway. The plant's closed drainage system, however, would help prevent such a run-off from the RPI property. Overall, there appears to be minimal risk of exposure to any human or environmental targets from this waste storage area.

## **3.2 SWMU NO. 2--STORAGE AND DISTRIBUTION CENTER BUILDING COMPLEX**

### Description

The storage and distribution center building complex is located on the northwest side of the RPI property, just south of SWMU No. 1 (Figure 2). The Storage building noted as the "Old Meal Bin", was a dry glue and resin process area from the late 1940s to about 1970. Since about 1970, when Monsanto discontinued dry glue and resin processing, the



BILL OF MATERIAL		
QTY	DESCRIPTION	P.O. NO.

NOTES:

1. EXACT LOCATION & ROUTE NOT DETERMINED
2. IE MARKINGS INDICATE FEET BELOW TOG, OR GRADE ELEVATION AT THAT POINT.
3. CED DWG 3141-DOI-001-C9-2 SHOWS THIS LINE IS STILL USED, BUT ONLY AS AN OVERFLOW
4. DOWNSPOUTS & STORM DRAINAGE PIPING AROUND MEAL BINS & DC BLDG PER DWG D100P1-1 (DTD 5-47)
5. PROCESS THROUGH THE SHORE TANK OVERFLOW SYSTEM IS COMBINED WITH THIS STORM SEWER LINE.
6. PD = PROCESS DRAINAGE, SD = SANITARY DRAINAGE, STD = STORM DRAINAGE, & VB = VALVE BOX

1	9-12-84	ADD NOTE 6, & MH#5	
0	7-21-83	ISSUED PER AS BUILT	
REV	DATE	DESCRIPTION	APPRO
<b>MONSANTO COMPANY</b> TECHNICAL SERVICES DEPT. SEATTLE, WA COMPANY CONFIDENTIAL THIS DRAWING IS THE PROPERTY OF MONSANTO CO. AND MUST BE ACCOUNTED FOR. INFORMATION HEREON IS CONFIDENTIAL AND MUST NOT BE REPRODUCED, REVEALED TO UNAUTHORIZED PERSONS OR SENT OUTSIDE THE COMPANY WITHOUT PROPER AUTHORIZATION.			
PLOT PLAN - ZONE 1 SANITARY DRAINAGE PIPING			DEPT NO
			AUTH NO
DRAWN	BY	DATE	APPROVED BY
DESIGN	M.E. ALLER	3-2-83	1
DETAILS			2
CHECKED			3
APPROVED			4
SCALE 1" = 20'-0"			DWG. NO. D-83002-00-01 REV. 1

- PROPERTY LINE & FENCE**

**DUWAMISH RIVER**

**CLARIFIER 2-924**

**STORAGE (OLD MEAL BIN)**

**DISTRIBUTION CENTER & WAREHOUSE**

**TRAILER PAD**

**PIPE ABOVE GROUND IN TRENCH**

**ABOVE GROUND TO PUMPS**

**ABOVE GROUND TO CLARIFIER**

**ABOVE GROUND PUMP**

**SUMP PUMP REMOVED**

**SUMP PUMP**

**PD#12**

**PD#13**

**PD#14**

**PD#15**

**PD#16**

**PD#17**

**PD#18**

**PD#19**

**PD#20**

**PD#21**

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**PD#287**

**PROPERTY LINE & FENCE**

**TRAILER PAD**

**DISTRIBUTION CENTER & WAREHOUSE**

**STORAGE (OLD MEAL BIN)**

**CLARIFIER 2-924**

**DUWAMISH RIVER**

**NOTES:**

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4. DOWNSPOUTS & STORM DRAINAGE PIPING AROUND MEAL BINS & DC BLDG. PER DWG. D100P1-1 (DTC 5-47)
5. PROCESS THROUGH THE SHORE TANK OVERFLOW SYSTEM IS COMBINED WITH THIS STORM SEWER LINE.
6. PD = PROCESS DRAINAGE, SD = SANITARY DRAINAGE, STD = STORM DRAINAGE, & VB = VALVE BOX
7. PIPE FROM CATCH BASIN PLUGGED. CATCH BASIN FILLED 10/89.
8. 6 INCH DIAMETER DUCTILE IRON PIPE RUNS FROM CATCH BASIN TO PROCESS #2 MANHOLE AT X 4-FT. DEEP.

**BILL OF MATERIAL**

QTY.	DESCRIPTION	P.O. NO.

**REV. DATE DESCRIPTION APPD.**

3	6-24-87	UPDATED HAZARDOUS WASTE CONTAINMENT	
2	7-5-86	ADDED LINE TO PUMPS	
1	9-12-84	ADD NOTE G, & MH #6.	
0	5-12-83	ISSUE PER AS BUILT	

**RHÔNE-POULENC**  
FINE ORGANICS DIVISION  
SEATTLE, WASHINGTON PLANT

**PLOT PLAN - ZONE 1  
PROCESS DRAINAGE PIPING**

**DEPT. NO. AUTH. NO.**

**SCALE: 1" = 20'-0"**

**DWG. NO. D-83001-00-01 REV. 3**

**OVERLAY B1-2 PAGE 61**